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UNITED STATE BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

GLENN H. TRUITT,

Debtor.

)
) CASE NO. BK-S-15-11201-ABL
) CHAPTER 7
)
) **DECLARATION OF LEE I IGLODY,**
) **ESQ. IN SUPPORT OF EX PARTE**
) **APPLICATION FOR 2004**
) **EXAMINATION OF DEBTOR AND**
) **REQUEST FOR DOCUMENTS**
) **PURSUANT TO RULE 45 OF THE**
) **FEDERAL RULES OF CIVIL**
) **PROCEDURE**
)
) Date of Hearing: N/A
) Time of Hearing: N/A
)
) Judge: Hon. August B. Landis

I, Lee I. Iglody, Esq., under oath and under penalty of perjury declare as follows:

1. I am an attorney duly licensed to practice law in the State of Nevada.

2. I am attorney of record for Adam Stokes ("Stokes"), an Interested Party in the above-referenced bankruptcy proceeding.

3. I have personal knowledge of the facts set forth herein.

4. I make this Declaration in support of the Ex Parte Application for Rule 2004 Examination of Debtor and Request for Documents Pursuant to Rule 45 of the Federal Rules of Civil Procedure (the "Application").

1 5. Stokes files the Application because its application for an order for the 2004
2 Examination is accompanied by a subpoena under which he is seeking the production of
3 documents from Debtor, and an order authorizing such 2004 examinations coupled with requests
4 for documents must be signed by a judge pursuant to LR 5075(a)(2)(L).
5

6 6. Stokes files this Application for an order for the 2004 Examination of the Debtor
7 regarding the acts, conduct, or property or to the liabilities and financial condition of the Debtor.
8

9 7. The Trustee, Victoria Nelson, and her counsel, Ryan Andersen, and Debtor, and
10 his counsel, Zachariah Larson, have indicated they are available on April 14, at 12:30 p.m.
11

12 8. Stokes seeks the production of documents from Debtor in conjunction with the
13 2004 Examination pursuant to a subpoena duces tecum as provided under F.R.C.P. 45.
14

15 9. The subpoena seeks the production of the following from Debtor:
16

17 a. Any and all documentation evidencing any ownership interest by Debtor in
18 Half Price Lawyers, LLC; Truitt & Associates, LLC; Ideal Business Partners,
19 Inc.; Stokes and Stokes, Inc.
20

21 b. Any and all licensing, trademark or other agreements evidencing any
22 trademark or other rights, or potential rights, owned by the Debtor or any
23 entity in which he has an interest, including rights related to: the trade name of
24 Half Price Lawyers; the website at <http://www.halfpricelawyers.com/>; and the
25 telephone number (702) 400-0000.
26

27 c. Any correspondence, including letters, faxes, emails between Debtor and
28 Stokes between December 1, 2014 and March 6, 2015.

 d. Any correspondence, including letters, faxes, emails between Debtor and any
 creditor listed in Debtor's March 6, 2015, petition, between January 1, 2015,
 and March 6, 2015.

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- e. Any and all documents evidencing Debtor's use of any loans from Stokes to Debtor.
- f. Any and all documents evidencing payments by Debtor on any loans from Stokes to Debtor from January 1, 2014 through March 6, 2015.
- g. Any and all financial statements for 2013-2015 for Debtor and Half Price Lawyers, LLC; Truitt & Associates, LLC; Ideal Business Partners, Inc.; Stokes and Stokes, Inc.
- h. Any and all tax returns and schedules for tax years 2013 and 2014 filed by Debtor individually and as officer/representative for Half Price Lawyers, LLC; Truitt & Associates, LLC; Ideal Business Partners, Inc.; Stokes and Stokes, Inc.
- i. Bank statements on all checking accounts belonging to Debtor or in which Debtor has or had any interest whatsoever either alone or jointly with any other person, and/or entity for one year preceding the date of this Order.
- j. Bank statements on all savings accounts belonging to Debtor or in which Debtor has or had any interest whatsoever either alone or jointly with any other person, and/or entity for one year preceding the date of this Order.
- k. Any and all documents evidencing use by Debtor of personal or company credit or debit cards from October 1, 2014 to March 6, 2015.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 31st day of March, 2015.

By:



Lee I. Iglody, Esq.

CERTIFICATE OF SERVICE


I hereby certify that I am an employee of Lee I. Iglody, Esq, and that on the 31st day of March, 2012, I caused to be served a true and correct copy of EX PARTE APPLICATION FOR 2004 EXAMINATION OF DEBTOR AND REQUEST FOR DOCUMENTS PURSUANT TO RULE 45 OF THE FEDERAL RULES OF CIVIL PROCEDURE in the following manner:

☒ (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31004) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, and their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.


An employee of Iglody Hulet Hogan